

COMMONWEALTH OF MASSACHUSETTS
Department of Telecommunications and Energy

**RESPONSE OF THE ATTORNEY GENERAL TO THE
SECOND SET OF INFORMATION REQUESTS FROM THE
BAY STATE GAS COMPANY
DTE 05-27**

Dated: August 2, 2005

Responsible Party: Jon Cavallo

BSG-AG-2-8 Please refer to the Cavallo Testimony at 3, lines 8-9. By indicating that Mr. Cavallo “specializ[es] in corrosion mitigation and protective coatings,” is it correct that Mr. Cavallo specializes in paint coatings?

Response: Mr. Cavallo’s entire civilian career has involved materials engineering, including corrosion mitigation. Since 1983, the bulk of Mr. Cavallo’s professional work has been in the area of protective coatings and linings, but he continues to work on various projects which involve corrosion of metallic and non-metallic materials. See response to BSG-AG-2-12 for a copy of Mr. Cavallo’s current CV.